

**From:** George Kunkel Jr [<mailto:kunkelwaterefficiency@gmail.com>]  
**Sent:** Sunday, July 02, 2017 3:18 PM  
**To:** DWR Water Use Efficiency  
**Cc:** [smosburg@sweetwater.org](mailto:smosburg@sweetwater.org)  
**Subject:** 2nd 15-Day Notice for Comments: Chapter 7 Division 2 Title 23 Water Loss Audits and Water Loss Control Reporting

Attention: Todd Thompson, Senior Engineer  
California Department of Water Resources  
Water Use Efficiency  
P.O. Box 942836  
Sacramento, CA 94236

**RE:** Comments to Notice of Modifications to Text of Proposed Regulations of Chapter 7, Division 2, of Title 23 dated June 16, 2017 - **2nd 15-day Comments.**

SECTION 700.3 (b)(5)(B)

This language is proposed as of June 16, 2017 to read "A summary of the Level 1 validation utility staff interview, including the basis for the input derivations and the DVS selections."

It is recommended to modify this language to instead read:

"A summary of the Level 1 validation utility staff interview, including the basis for the input derivations and the **data grading value** selections."

Reason for the recommendation: the term "DVS selections" is not appropriate since the Data Validity Score, or DVS, is not a "selected value" but instead a "calculated value" in the AWWA Free Water Audit Software. It is believed that the intent of this provision is to provide a basis for the two primary types of data entered by the auditor: the data inputs and the data grading values, thus it is recommended to change "DVS" to "data grading value".

SECTION 700.3 (b)(5)(C)

This language is proposed as of June 16, 2017 to read "Any recommended changes to the water audit inputs by the water audit validator that were not accepted by the urban retail water supplier and the rationale for not accepting the recommendations."

If the intent of the language is to document all recommendations of the validator that were not accepted by the water utility, then it is suggested that the language be revised to read:

"Any recommended changes to the water audit inputs **and data grading values** by the water audit validator that were not accepted by the urban retail water supplier and the rationale for not accepting the recommendations."

SECTION 700.5 (c)

Regarding the revised wording, which currently reads as below, I am in full agreement with these most recent revisions dated June 16, 2017, which now follow best practice as defined in the AWWA M36 publication, 4th Edition:

(c) In the case of urban retail water suppliers with two or more separate public potable water systems, the urban retail water supplier shall submit a separate AWWA Free Water Audit Software spreadsheet worksheet meeting the requirements in Section 700.5(b)(1) for each potable water system.

Thank you for the opportunity to provide comments to this important language.

Sincerely,

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George Kunkel, P.E.  
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Chair, AWWA M36 Sub-committee

Chair, Technical Program Sub-Committee NAWL2017